

 <p style="text-align: center;">Heritage Provider Network &amp; Affiliated Medical Groups</p>	Program: HIPAA Compliance			
	Policy No.	Effective Date: 01/01/2012	Page - 1 -	
	Authored by: Compliance Committee	Date: 01/01/2012	Revised by: Sandy Finley	Date: 02/02/2015
	Approved by: Compliance Committee	Date: 02/02/2015		
Title of Policy: HIPAA Compliance Oversight				

**PURPOSE:**

Establish a guideline for oversight to ensure Heritage Provider Network & Affiliated Medical Groups are compliant with HIPAA policies and procedures that are established by the Compliance Committee.

**POLICY:**

It is the policy of Heritage Provider Network & Affiliated Medical Groups that there is an effective oversight of all appropriate adherence to the compliance policies.

**RESPONSIBILITY:**

HIPAA/Compliance Officer and Corporate Compliance Officer

**PROCEDURE:**

1. On a semi-annual basis, the Compliance Officers will audit each groups' electronic data to make sure that strict adherence to the policies are followed in auditing the following information:
  - a. Certificate of Destruction: Folder for HIPAA compliance. Path: Compliance Plan/ HIPAA/ Certificate of Destruction/ Year. File name to follow the following minimum format: COD\_Year\_Month.

**REFERENCE:**

CFR 45, § 160.304 of the Privacy Regulations